

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1  
Applicant Name: John Rauch  
Proceeding Name: 98-143 Author Name:   
Lawfirm Name:   
Contact Name: applicant\_name Contact Email: john@cycat.com  
Address Line 1: c/o 1450 West Lake Brantley Road  
Address Line 2:   
City: Longwood State: FL ☒  
Zip Code: 32779 Postal Code:   
Submission Type: CO ☒ Submission Status: ACCEPTED ☒ Viewing Status: UNRESTRICTED ☒  
Subject:   
DA Number:  Exparte Late Filed: ☐ File Number:   
Calendar Date Filed: 08/12/1998 12:30:10 PM Date Disseminated:  Filed From: INTERNET  
Official Date Filed: 08/12/1998 Date Released/Denied:  Initials:   
Confirmation # 1998812726034 Date Filed:

DOCKET FILE COPY ORIGINAL

INTERNET FILING

98-143  
8/12/98

RECEIVED

AUG 12 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

No. of Copies rec'd 1  
List A B C D E

In your proposal, you have suggested establishing a system that cleans up the licensure categories, into a simplified grouping system. Bravo!

However, you have not proposed any changes to the CW proficiency level requirements...! Most interesting position to take.... initially.

In that the International minimal requirement and the only requirement on CW proficiency speeds that are in existence in their rules, is only 5 wpm, then perhaps, when establishing a CW proficiency level for a minimal level license, now proposed as GENERAL, you might consider the issue of consistency, and re-propose the level to be consistent with the International level of 5 wpm, particularly in light of the issue of reciprocity..

Additionally, if you use the wording in your regulations to reflect that the code level of HF proficiency to be the same as "xxxx" (the International rule - currently at 5 wpm) then, IF the International standard changes, you do not need to revisit this issue, as the proficiency level will automatically be changed to "0". This is the KISS theory... Keep It Simple, Stupid...

As for the rationale for a potential future level of "0", remember that it has already been determined that the "Public Safety" does not require the use of CW/Morse Code proficiency on navigatable waters or seas when the USCG et al dropped the requirement for Morse Code Proficiency for such - Interstate

AND International vessels. If there is no need on the navigatable rivers in the various states of the Union, and on the High Seas, outside of the territorial waters of the States and Territories, where is the justification for a different standard on an Interstate Highway.

Additionally, there is currently no statutory requirement for a license to be used when communicating within the several States by state Citizens for communication of a non-commercial nature, between other state Citizen of any of the several States.

Thus, it might be propitious to claim the international standard as the ONLY level required for ALL HF communications, due to the requirements of International

Treaty. Again, when the Treaty is amended, so will your proficiency levels.... KISS!

Keep up the good work,  
John Rauch  
N4YXS, PG(1)-7-10223